

The following are concerns regarding the proposed Maritime Security Regulations from Evansville Marine Service.

1. What SOLAS requirements are being considered for application to the harbor industry?
2. Will standards for the harbor industry differ from line haul companies?
3. What are the obligations of harbor services specifically in regard to barges?
4. What type of VSA will be required of harbor vessels with a two (2) man crew?
5. What type of VSP will be required of harbor vessels with a two (2) man crew?
6. Security records for the harbor industry should be kept by management, not on the vessel.
7. What type of training will be required of the CSO?
8. Confirm that VSO's will not be required on towing vessels.
9. What type of drills and training will be required of harbor services?
10. Confirm that security alert systems will not be required on towing vessels.
11. What will the identification requirements be for dockhands, barge cleaners, vendors etc?
12. What will identification requirements be for harbor vessels to transport line boat crew change personnel?
13. AIS will have no benefit to the harbor industry.
14. NAVIC 11-02 appears to have been written for cargo handling facilities but has been written in such a way that it could apply to anything near the water. How will it be applied?
15. Using the figures prepared by CGHQ the startup costs for EMS should be in excess of \$65,000. These figures do not include any costs for docks, drydocks, fleets, cranes, Automatic Identification Requirements or our shops. While some are not specifically addressed they are sure to have some security requirements.

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